

SUSMAN GODFREY L.L.P.

June 18, 2025

Hon. Ona T. Wang
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *The New York Times Company v. Microsoft Corporation, et al.*,
No.: 23-cv-11195-SHS: Sealing Docket Entries 653 and 656

Dear Magistrate Judge Wang:

Plaintiff The New York Times Company (“The Times”) respectfully requests the Court seal Docket Entries 653 and 656 (1:23-cv-11195-SHS-OTW), as well as the accompanying Docket entries at 191 and 194 (1:25-md-03143-SHS-OTW). These docket entries contain redacted versions of The Times’s letter oppositions to OpenAI’s motions to compel. However, it has come to The Times’s attention that the redactions were not properly applied. The Times will refile corrected copies on the docket.

Respectfully submitted,

/s/ Ian B. Crosby
Ian B. Crosby
Susman Godfrey L.L.P.

cc: All Counsel of Record (via ECF)